

OFFICE OF ATTORNEY GENERAL

MEMORANDUMWILLIAM J. SCOTT
ATTORNEY GENERAL

TO Richard W. Cosby October 3, 1980
FROM Reed W. Neuman RWN
SUBJECT Cahokia/Dead Creek - Monsanto Technical Meeting

On September 29, 1980, a meeting was held at IEPA between Monsanto Corporation and IEPA technical personnel. Monsanto requested the meeting to inquire about the Agency's sampling and analytical procedures, and to propose a co-operative effort to conduct further testing in Dead Creek.

In attendance for Monsanto were four research chemists and environmental engineers, led by Paul Heisler, Environmental and Safety officer. IEPA personnel present were John Renkes and Jim Kelty, ERU, John Hurley of Lab. Services and Stan Parsons, Land Enforcement. Parenthetically, the Monsanto folks were somewhat irritated and surprised by my presence, but because I largely stayed out of the proceedings the discussion went ahead relatively uninhibited.

Heisler began by expressing skepticism about the accuracy of the Agency's recent sample results. Monsanto apparently had sampled the creek bed themselves twice recently, once five months and again three to four weeks ago. Their tests somehow failed to detect PCB's or elemental phosphorus, and feigned surprise that the Agency found same. They also apparently tested the soils to substantiate the

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claims that the creek bed had occasionally self-ignited, saying their tests found this to be "not true". They allowed as how they "knew" that the recent combustion incidents were caused by outside forces lighting brush in the ditch area, i.e. dirt bikers, people burning rubbish, etc. The Agency people were doing a commendable job of biting their tongues at this point.

John Hurley described the equipment and procedures used in IEPA's organic and inorganic labs, with which Monsanto could find no fault. However, they questioned whether the testing done to this point had been sufficient to conclusively identify the specific chemical formulations and thus allow anyone to say whose stuff it is in the ditch. The Agency's results seem to identify blends and formulations that were uniquely or largely handled by Monsanto Corporation, the most significant being PCB's and elemental phosphorus. Monsanto acknowledged that they have indeed produced these materials at some time.

Heisler thus wanted to know if the Agency had plans to do any more sampling, and if it would not mind joining Monsanto in a cooperative effort. Their apparent aim is to verify the presence in the ditch of certain compounds traceable to Monsanto. It was agreed that more samples would be taken, in the same general areas already tested by the Agency, with an eye towards identifying specific compounds. Kelty had prepared a memo outlining the sampling program (attached), which Mauzy had approved with one change (note * *). The compounds to be tested for were listed, as well

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as the testing procedures to be employed. The program is scheduled to begin the end of this week, with the results due in two weeks. Of course, I will be copied on all results obtained, from both sources.

In closing the meeting, Renkes questioned Monsanto's people about their knowledge of the suspected Sauget dump. Heisler, a 42-year employee at Monsanto's Sauget complex, said the company has "no record" of any dumping there, only that he had heard of Monsanto wastes being landfilled in the area maybe 50 years ago, but did not know where or when. Like a trooper, he said this with a straight face; however, this was the first time the state had confronted Monsanto directly about the dump, and probably not the setting in which to expect candor.

cc: file

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DATE: September 29, 1980

TO: John Renkes

FROM: Jim Kelty

SUBJECT: IEPA and MONSANTO CHEMICAL COMPANY COOPERATIVE SAMPLING PROGRAM IN DEAD CREEK, SAUGET/CAHOKIA.

The purpose of this memo is to outline a program for joint sampling and analysis between the IEPA and Monsanto Chemical Company in Dead Creek.

- 1) Sampling will be done on October 2, 1980, beginning at approximately 2:00 p.m. and will be conducted by IEPA, ERU Personnel and Monsanto Chemical Company Representatives.
- 2) Soil samples will be taken from the north, central, and south areas of the ditch from sites previously determined by the IEPA to be contaminated.
- 3) Samples will be split and submitted to respective laboratories for elemental analysis and also organic analysis for PCB's ~~and other~~ ~~chlorinated hydrocarbons~~. Laboratory procedures will be exchanged.
- 4) Laboratory results should be completed by October 16, 1980, at which time a meeting can be scheduled for the purpose of comparing and discussing results.
- 5) It is requested that all results be kept confidential until such a time that it is mutually agreeable to make them public.

JK:jks

★ will test for:

- 1) PCB's - no other chlorinated hydrocarbons
- 2) total phosphorus - break down fully to elemental
- 3) chlorinated phenols -
chlorinated benzene
chloronitrobenzene.

★★ Each party will separately maintain records of sampling procedure followed, as well as fully documenting the chain of custody.